

Stephen J. Estey (Bar No. 163093)
 steve@estey-bomberger.com
 R Michael Bomberger (Bar No. 169866)
 mike@estey-bomberger.com
 ESTEY & BOMBERGER, LLP
 2869 India Street
 San Diego, CA 92103
 Telephone: (619) 295-0035
 Facsimile: (619) 295-0172

Donald J. Beck (Bar No. 70108)
 Law Office of Donald J. Beck
 2217 Galveston Street
 San Diego CA 92110
 Phone (619) 990-2524

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

| | |
|---|---|
| THERESA BUCKMAN- FALDUTI, an individual; TODD FALDUTI, an individual, Plaintiffs, vs. KINDERCARE LEARNING CENTERS, INC., a Delaware corporation, Defendant. |) Case No.: C 08-04778 CW)) STIPULATION AND ORDER TO) EXTEND THE TIME FOR EXPERT) DEPOSITIONS; MOTIONS TO COMPEL) EXPERT DISCOVERY; AND HEARING) ON MOTION FOR SUMMARY) JUDGMENT; DECLARATION OF) STEPHEN J. ESTEY IN SUPPORT) THEREOF))) Judge: Hon. Claudia Wilkin) Dept: Courtroom 2, 4th Floor)) |
|---|---|

Pursuant to Local Rules 6-2 and 7-12, Defendant KINDERCARE LEARNING CENTERS, INC. ("KinderCare") and Plaintiffs THERESA BUCKMAN-FALDUTI and TODD FALDUTI (collectively, the "Parties") stipulate to extend:

- (1) The time to complete the depositions of Todd Falduti and the following fact witnesses: Amber Bushaw, Susan Berry, and Dr. Juan Vargas from Wednesday, April 14, 2010 to Wednesday, July 14, 2010;
- (2) The time to file and serve motions to compel fact discovery from Friday,

- 1 April 23, 2010 to Wednesday, July 21, 2010;
- 2 (3) The time to complete retained and non-retained expert depositions from
- 3 Wednesday, April 14, 2010 to Wednesday, July 14, 2010;
- 4 (4) The time to file and serve motions to compel retained and non-retained
- 5 expert discovery from Friday, April 23, 2010 to Wednesday, July 21, 2010;
- 6 (5) The hearing date on defendant's Motion for Summary Judgment (and
- 7 related briefing deadlines) from Thursday, April 15, 2010 to Thursday, July
- 8 15, 2010; and
- 9 (6) The Case Management Conference from Thursday, April 15, 2010 to
- 10 Thursday, July 15, 2010.

11 for the reasons stated in the Declaration of Stephen J. Estey attached hereto as Exhibit "A".

12 The parties stipulate that it is not necessary to continue the November 9, 2010 Final

13 Pretrial Conference and the November 29, 2010 trial date at this time.

14 IT IS SO STIPULATED.

15 DATED: March 17, 2010 SEYFARTH SHAW LLP

16 By: /s/ Giovanna A. Ferrari

17 Jay W. Connolly

18 Giovanna A. Ferrari

19 Attorneys for Defendant

KINDERCARE LEARNING CENTERS, INC.

20 DATED: March 17, 20010 ESTEY & BOMBERGER, LLP

21 By: /s/ Stephen J. Estey

22 Stephen Estey

23 Michael Bomberger

24 Attorneys for Plaintiffs

THERESA BUCKMAN-FALDUTI AND

TODD FALDUTI

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 Dated: 3/25/10 _____

27 _____

28 
Hon. Judge Claudia Wilken